

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION

IN RE:

BAXLEY CORPORATION, LLC

DEBTOR

CASE NO:

22-00397-5-DMW

CHAPTER 7

**NOTICE OF SEVENTH APPLICATION FOR COMPENSATION AND MOTION FOR
FINAL APPROVAL OF COMPENSATION OF ACCOUNTANT
(Williams Overman Pierce, LLP)**

James B. Angell, Chapter 7 Trustee in the above referenced case (“Trustee”) has filed papers with the Court to apply for compensation and for final approval of compensation for Williams Overman Pierce, LLP (“Accountant”) in this case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to allow the application, or if you want the court to consider your views on the application, then on or before **July 25, 2025**, you or your attorney must file with the court, pursuant to Local Rule 9013-1 and 9014-1, a written response, an answer explaining your position, and a request for hearing at:

Clerk, U.S. Bankruptcy Court
Eastern District of North Carolina
PO Box 791
Raleigh, North Carolina 27602

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to:

Brian C. Behr, Esquire Bankruptcy Administrator 434 Fayetteville Street, Suite 640 Raleigh, NC 27601	James B. Angell Chapter 7 Trustee P.O. Box 12347 Raleigh, NC 27605
Bill Kroll Everett Gaskins Hancock, LLP 220 Fayetteville Street #300 Raleigh, NC 27601	George M. Oliver Po Box 1548 New Bern, NC 28563

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the application and may enter an order granting that relief.

DATED: July 1 2025

s/James B. Angell

James B. Angell, Chapter 7 Trustee

Howard Stallings Law Firm

State Bar No. 12844

P.O. Box 12347

Raleigh, NC 27605

Telephone: (919) 821-7700

Facsimile: (919) 821-7703

jangell@howardstallings.com

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**SEVENTH APPLICATION FOR COMPENSATION AND MOTION FOR FINAL
APPROVAL OF COMPENSATION OF ACCOUNTANT
(Williams Overman Pierce, LLP)**

Now comes James B. Angell, Chapter 7 Trustee (“Trustee”), by and through undersigned counsel, and hereby moves the Court for approval of compensation and final approval of total compensation payable to Williams Overman Pierce, LLP (“Accountant”) as Accountant in this case. In support thereof, he respectfully represents to the Court:

1. This matter is a core proceeding pursuant to 28 U.S.C. §157, and the Court has jurisdiction pursuant to 28 U.S.C. §§151, 157 and 1334. The Court has the authority to hear this matter pursuant to the General Order of Reference entered August 3, 1984, by the United States District Court for the Eastern District of North Carolina.
2. In the course of the affairs of the bankruptcy estate, it became necessary for the Trustee to obtain the services of an Accountant. (DE 22) On March 4, 2022, the Trustee filed an Application to Employ Williams Overman Pierce, LLP as Accountant in this case. An order was entered allowing employment on March 24, 2022. (DE 75)
3. The Accountant was employed to perform the following professional services:
 - a. To review and prepare tax returns of Baxley Corporation, LLC; and
 - b. To serve as an expert witness on request by the Trustee.
 - c. To perform any other accounting services for the Trustee as may be necessary in this Chapter 7 proceeding.
4. This is the sixth application for payment of the Accountant in this case.
5. The Accountant was awarded fees as follows:
 - a. On November 14, 2022 the Accountant was awarded fees in the amount of \$5,080.00 for services rendered from March 14, 2022 through September 27, 2022 (DE 303, 317);

- b. On September 14, 2023, the Accountant was awarded fees in the amount of \$7,410.00 for services rendered from October 11, 2022 through February 27, 2023 (DE 414, 420);
 - c. On September 18, 2023, the Accountant was awarded fees in the amount of \$3,538.00 for services rendered from October 11, 2022 to February 23, 2023 for services rendered in obtaining forgiveness of a PPP loan, such fees to be paid by Pinnacle Bank (DE 417. 424); and
 - d. On November 27, 2023, the Accountant was awarded fees in the amount of \$1,872.00 for services rendered from August 1, 2023 through September 11, 2023 (DE 452, 463).
 - e. On November 26, 2024, the Accountant was awarded fees in the amount of \$2,567.00 for services rendered from February 5, 2023 through February 23, 2024 (DE 489, 497).
 - f. On June 9, 2025, the Trustee filed an application for approval of interim compensation for the Accountant in the amount of \$2,101.50 for services rendered from February 27, 2025 through May 30, 2025, which is pending before the Court. (DE 518)
6. The Trustee seeks allowance of compensation and authorization to make payment to Accountant for services rendered during the period of June 10, 2025 through June 26, 2025. The total payment of fees sought is \$3,193.00. A copy of the billing worksheet is attached as Exhibit A.
 7. During the application period, the Accountant prepared the 2025 (final) partnership tax return.
 8. The credentials for Williams Overman Pierce, LLP are attached hereto as Exhibit B.
 9. The Trustee further discloses the following:
 - 1) Effective April 30, 2025, the accounting firm of Williams Overman Pierce, LLP merged with other accounting firms (the "Merging Firms") in other states as follows:
 1. Chigbrow Ryan Murata (Idaho),
 2. Harris (Idaho)
 3. SBF Advisors (Florida),
 4. KMA Advisors (Wisconsin),
 5. KDP Advisors (Oregon),
 6. Aycock & Company (Texas),
 7. Pisenti & Brinker (California),
 8. Hoerber Tillman & Company (Florida),
 9. Stockman Kast Ryan & Company (Colorado),

10. Acuity (Georgia),
 11. JRJBF (Illinois),
 12. Capital Nomics Valuations (California),
 13. Roeser Accountancy (California)
- 2) The name of the surviving accounting firm is Sorren CPAs.
 - 3) The conflicts system for the surviving firm will not be integrated and accessible until later this year, estimated to be around December, 2025.
 - 4) None of the Merging Firms have offices in North Carolina.
 - 5) The services provided to the Trustee were performed by the same professionals who performed such services prior to the merger, primarily Edward Golden, CPA and Kristen Potter, CPA.
 - 6) The principals of Williams Overman Pierce, L.L.P. are unaware of any conflicts of interest that would inhibit their independence in performing services for the Trustee.
10. The Trustee further seeks final approval of compensation payable to the Accountant in the amount of \$22,223.50 payable from the estate and \$3,538.00 payable from Pinnacle Bank pursuant to 11 U.S.C. §330.
 11. The services rendered by Accountant were beneficial to the bankruptcy estate. The amount sought is fair and reasonable for the services rendered.

WHEREFORE, it is hereby respectfully requested:

1. That the Court approve and allow compensation in the amount of \$3,193.00 due to Williams Overman Pierce, LLP., Accountant, for services rendered from June 10, 2025 through June 26, 2025;
2. That the Trustee be authorized to make payment of the compensation sought herein to the Accountant;
3. That the Court approve, on a final basis, compensation payable to the Accountant in the amount of \$22,223.50 payable from the estate and \$3,538.00 payable from Pinnacle Bank pursuant to 11 U.S.C. §330; and
4. That the Court grant such other relief as is just and proper.

DATED: July 1, 2025

s/James B. Angell
James B. Angell, Chapter 7 Trustee
Howard Stallings Law Firm

State Bar No. 12844
P.O. Box 12347
Raleigh, NC 27605
Telephone: (919) 821-7700
Facsimile: (919) 821-7703
jangell@howardstallings.com

WILLIAMS OVERMAN PIERCE LLP						
Billing Worksheet By Service Code						
For Accounting period dates:None, For Transaction dates:1/1/2020 - 6/27/2025						
EXHIBIT A						
0203529 - Baxley Corporation, LLC						
Subcategory	Service Code	Date	Staff	Rate	Hours	WIP
01065	Partnership Tax Returns (10650)	6/10/2025	Golden, Edward (GoldenE)	325.00	0.40	130.00
Invoice desc: setup for final short-year return						
01065	Preparation (10653)	6/16/2025	Martinez-Saucedo, Susana (MartinezS)	210.00	1.50	315.00
Internal note: prep workpapers; year-end adjustments						
01120	Supervision of 1120 (11204)	6/16/2025	Vetter, Jessica (VetterJ)	300.00	0.50	150.00
Internal note: work w/ preparer on prep of final returns						
01065	Preparation (10653)	6/17/2025	Martinez-Saucedo, Susana (MartinezS)	210.00	2.80	588.00
Internal note: prep tax returns; supporting documetns						
01065	Preparation (10653)	6/19/2025	Martinez-Saucedo, Susana (MartinezS)	210.00	3.50	735.00
Internal note: completed return prep						
01065	Review (10654)	6/19/2025	Vetter, Jessica (VetterJ)	300.00	2.30	690.00
Internal note: Tech review						
01065	Partnership Tax Returns (10650)	6/25/2025	Golden, Edward (GoldenE)	325.00	1.50	487.50
Invoice desc: partner review 2025 final tax returns, wps & disclosures						
01065	Partnership Tax Returns (10650)	6/26/2025	Golden, Edward (GoldenE)	325.00	0.30	97.50
Invoice desc: final files to client						
Invoice Total					12.80	3,193.00

**Williams Overman Pierce, LLP
Biographical Information**

EXHIBIT B

Edward A. Golden, CPA

Edward A. Golden, a partner in the Raleigh office, joined Williams Overman Pierce, LLP in May 2007. Edward graduated from University of Stony Brook in New York in 1999 with a Bachelor of Science degree in business management and then graduated from C.W. Post University in New York in 2000 with a Masters of Science degree in accounting. Edward's primary focus at the firm is in taxation. Prior to joining Williams Overman Pierce, LLP, Edward worked for a CPA firm in New York.

Edward is a licensed CPA in New York and North Carolina, and is a member of the AICPA, NYS Society of Certified Public Accountants, the NC Association of Certified Public Accountants and the American Bankruptcy Institute.

Kristen Potter, CPA, CVA

Kristen Potter joined Williams Overman Pierce, LLP in August 2011 and is currently a senior manager. Kristen graduated from East Carolina University where she earned a Bachelor of Science in Business Administration with a concentration in accounting in 2009 and a Master of Science degree in accounting in 2011. Kristen's primary areas of concentration are in tax and business valuation.

Jessica Vetter, CPA

Jessica Vetter joined Williams Overman Pierce, LLP in January 2020 and is currently a manager. Jessica graduated from East Carolina University where she earned a Bachelor of Science degree in accounting in 2017. Prior to joining the firm, Jessica worked for another accounting firm in North Carolina. Jessica's primary focus is in tax and assurance services.

Susana Martinez-Saucedo

Susana Martinez-Saucedo joined Williams Overman Pierce, LLP in May 2023 and is currently a staff accountant. Susana graduated from Campbell University in 2019 with a Bachelor's degree and graduated from East Carolina University in 2023 with a Master of Science degree in accounting. Susana's primary focus is in tax and accounting services.

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CERTIFICATE OF SERVICE

The undersigned, of the Howard Stallings Law Firm, certifies:

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age:

That on this day the foregoing **SEVENTH APPLICATION FOR COMPENSATION AND MOTION FOR FINAL APPROVAL OF COMPENSATION OF ACCOUNTANT (Williams Overman Pierce, LLP)** and **Notice of Application** was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the parties listed below. I further certify that I have mailed the document to the non-CM/ECF participants as set out below by first class mail.

I certify under penalty of perjury that the foregoing is true and correct.

DATE: July 1, 2025

s/ James B. Angell
James B. Angell
P.O. Box 12347
Raleigh, NC 27605

Brian C. Behr, Esquire Bankruptcy Administrator <i>Served via cm/ecf and by email to Lesley_Dean@nceba.uscourts.gov and</i>	George M. Oliver Attorney for Debtor <i>Served via cm/ecf</i>
Bill Kroll Everett Gaskins Hancock, LLP Attorney for Martha Baxley <i>Served via cm/ecf</i>	Williams Overman Pierce, LLP Attn: Edward A. Golden 2501 Atrium Drive, Suite 500 Raleigh, NC 27607